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9  
10 **BEFORE THE**  
11 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

12 HEARING IN THE MATTER OF  
13 CALIFORNIA DEPARTMENT OF WATER  
14 RESOURCES AND UNITED STATES  
15 BUREAU OF RECLAMATION'S  
16 REQUEST FOR A CHANGE IN POINT OF  
17 DIVERSION FOR CALIFORNIA WATER  
18 FIX

ISLANDS, INC. RESPONSE TO  
EVIDENTIARY OBJECTIONS FROM  
DEPARTMENT OF WATER RESOURCES

19 Islands, Inc. hereby submits its Response to Objections filed by the California  
20 Department of Water Resources ("DWR").

21 DWR has filed Master Objections without relating them to specific testimony or exhibits,  
22 so that it is difficult to discern which testimony and/or exhibits are actually the object of the  
23 objections. For this reason alone, the Board should rule against these objections for failing to  
24 refer to specific testimony and exhibits and assigning actual evidentiary objections to each.

25 DWR has filed generic objections based upon: 1) testimony and exhibits that are  
26 outside the scope of Part 1; 2) testimony and exhibits that do not meet statutory requirements;  
27 3) issues related to Part 2 of the hearings; and 4) evidentiary and procedural issues such as  
28 legal arguments, conclusory testimony and policy statements.

Islands, Inc. submitted its protests based on potential impact to its agricultural  
operations. Islands, Inc. has joined with other similarly situated landowners and entities in  
order to more efficiently present on the issues that affect agriculture. The testimony of Tom  
Hester, President of Islands, Inc. and Bradley Lang, Diablo Vineyards go directly to their  
agricultural operations and the issues associated with such operations. The testimony of

1 Hester and Lang are relevant and address issues regarding water quality, water quantity and  
2 impacts on farming.

3 The testimony of Erik Ringelberg, Michelle Leinfelder-Miles and Stan Grant all relate to  
4 the salinity issue but from different perspectives. Mr. Grant focuses on salinity effects on  
5 vineyards. Dr. Leinfelder-Miles focuses on the soli chemistry on Ryer Island and reports on  
6 soil samples taken on the island and the current salinity situation. She also reports on the  
7 impacts and mitigations necessary to prevent damage from salinity. Finally, Mr. Ringelberg  
8 focuses on the negative impacts from salinity intrusion in the Delta and the specific impact to  
9 farming on Ryer Island.

10 There can be no question the opinions of these three experts are relevant and they are  
11 more than qualified to offer these opinions.

12 For these reasons, the objections of DWR should be overruled.

13 Dated: September 30, 2016

HANSON BRIDGETT LLP

14  
15 By: 

16 Michael J. Van Zandt  
17 Attorneys for Protestant Islands, Inc.  
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1 STATEMENT OF SERVICE


2 **CALIFORNIA WATERFIX PETITION HEARING**  
3 **Department of Water Resources and U.S. Bureau of Reclamation (Petitioners)**

4 I hereby certify that I have on this 30th day of September 2016, submitted to the State Water  
5 Resources Control Board and caused a true and correct copy of the following document(s):

6 **ISLANDS, INC. RESPONSE TO EVIDENTIARY OBJECTIONS FROM DEPARTMENT OF**  
7 **WATER RESOURCES**

8  
9 to be served **by Electronic Mail** (email) upon the parties listed in Table 1 of the **Current**  
10 **Service List** for the California WaterFix Petition Hearing, dated September 30, 2016, posted  
11 by the State Water Resources Control Board at  
12 [http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfi](http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml)  
13 [x/service\\_list.shtml](http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml)

14 I certify that the foregoing is true and correct and that this document was executed on  
15 September 30, 2016.

16 Signature: 

17 Keith Kiley  
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